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Proposed Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ESTHER LOWINGER,

Plaintiff,

v.

PZENA INVESTMENT MANAGEMENT, INC.,
and RICHARD C. PZENA,

Defendants.

----- X

JERE C. WHITE, individually and on behalf of
all other persons similarly situated,

Plaintiff,

v.

PZENA INVESTMENT MANAGEMENT, INC.,
and RICHARD C. PZENA,

Defendants.

----- X

Civil Action No. 07-10524 (AKH)

ECF Case

Civil Action No. 08-00406 (AKH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the attached Declaration of Jeffrey S. Abraham and the accompanying memorandum of law, Plaintiff Esther Lowinger will move this Court, on

February 18, 2008 at 10:00 a.m. or as soon thereafter as this matter can be heard, before the Honorable Alvin K. Hellerstein, in Courtroom 14D, at the United States Courthouse, 500 Pearl Street, New York, New York, pursuant to Fed. R. Civ. P. 42(a) and the Private Securities Litigation Reform Act of 1995, for an order: (i) consolidating all related actions; (ii) appointing Ms. Lowinger as lead plaintiff; (iii) appointing Abraham, Fruchter & Twersky, LLP as lead counsel and for such other relief as the Court may deem just and proper.

Dated: January 22, 2008

ABRAHAM, FRUCHTER & TWERSKY, LLP

By: 

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